

IN RE: Kristin Ognjanovac	:	IN THE UNITED STATES
a/k/a Kristin A. Joralemon	:	BANKRUPTCY COURT FOR THE
Debtors	:	EASTERN DISTRICT OF
	:	PENNSYLVANIA
	:	
	:	CASE NO. 17-16955-pmm
Kristin Ognjanovac	:	Chapter 7
a/k/a Kristin A. Joralemon	:	
Movant	:	
	:	
	:	
Vs.	:	
	:	
	:	
Midland Funding, LLC	:	
Respondent	:	
	:	

**NOTICE OF MOTION, RESPONSE DEADLINE**  
**AND HEARING DATE**

Michael J. McCrystal, Attorney for the Movant, has filed a Motion to Avoid the Judicial Lien of Midland Funding, LLC

***Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (if you do not have an attorney, you may wish to consult an attorney.)***

1. If you do not want the Court to grant the relief sought in this motion or if you want the Court to consider your views on this Motion, then on or before December 1, 2021, you or your attorney must do **all** of the following

(A) file an answer explaining your position at:

Clerk, United States Bankruptcy Court for  
The Eastern District of Pennsylvania  
201 Penn Street, STE 103  
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail early enough so that it will be received on or before the date stated above

(B) Mail a copy to the Movant's Attorney:

Michael J. McCrystal, Esquire  
326 Main Street, STE 1  
Emmaus, PA 18049  
(610) 262-7873  
(610) 262-2219 (facsimile)

(C) Mail a copy to :

Office of the United States Trustee	Michael H. Kaliner, Esquire
200 Chestnut Street	350 S. Main Street
Suite 502	STE 105
Philadelphia, PA 19106	Doylestown, PA 18901

2. If you or your attorney do not take the steps described in 1(A) and 1(B) above and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
3. A hearing on the Motion is scheduled before the Honorable Patricia M. Mayer on December 7, 2021 at 11:00 AM at Bankruptcy Courtroom United States Bankruptcy Court for the Eastern District of Pennsylvania, Gateway Bldg. 201 Penn Street, 4<sup>th</sup> Floor, Reading, PA 19601.
4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you, if you request a copy from the attorney named in paragraph 1(B).
5. You may contact the Bankruptcy Court Clerk's Office at 610-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

/s/ Michael J. McCrystal  
Michael J. McCrystal, Esquire